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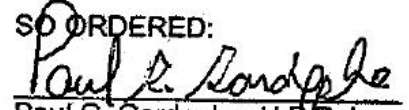
BY ECF

Honorable Paul G. Gardephe
United States District Judge
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

MEMO ENDORSED

The Application is granted.

SO ORDERED:


Paul G. Gardephe, U.S.D.J.

Dated: June 18, 2020

Re: Maya Zabar v. New York City Department of Education, et al.
Docket No. 18-CV-06657 (PGG)

Dear Judge Gardephe:

I am an Assistant Corporation Counsel in the office of James E. Johnson, Corporation Counsel of the City of New York, counsel for the defendant Board of Education of the City School District of the City of New York ("BOE") (also known as and sued herein as the "New York City Department of Education") and the individually named defendants Manuel Ureña, Lynn Rosales, and Sari Perez in the above-referenced action. On June 11, 2020, Your Honor set a briefing schedule for the Defendants' motion for summary judgment. ECF Dkt. 89. I write to request that Your Honor extend the Defendants' time to file its motion for summary judgment from July 11, 2020 until August 31, 2020 due to several other previously scheduled deadlines that interfere with meeting the original Court-imposed deadline. In addition, Defendants' anticipate difficulties in accessing documents and reaching witnesses and clients while working remotely during Covid-19 restrictions. Plaintiff's counsel has consented to this request.

The parties have agreed to the below proposed briefing schedule:

Defendants' Motion for Summary Judgment due: August 31, 2020

Plaintiff's Opposition Motion Due: October 5, 2020

Defendants' Reply Motion Due: October 26, 2020

This is the first such request of this Court for additional time to file the Defendants' Motion for Summary Judgment and to adopt the proposed briefing schedule. There are no other dates that would be affected by this request.

Respectfully submitted,

/s/ Samantha P. Turetsky
Samantha P. Turetsky
Assistant Corporation Counsel

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